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8 Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY
9 INTERNATIONAL

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10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF MARIN

13 CHURCH OF SCIENTOLOGY) CASE NO. 157 680
14 INTERNATIONAL, a California not-)
for-profit religious corporation,) [CONSOLIDATED]
15)
16) PLAINTIFF'S NOTICE OF
17 Plaintiff,) MOTION AND MOTION FOR
PROTECTIVE ORDER; REQUEST
18 vs.) FOR SANCTIONS AGAINST
DEFENDANT GERALD ARMSTRONG
AND HIS ATTORNEY, FORD
19) GREENE
20) DATE: March 9, 1995
TIME: 10:00 a.m.
DEPT: LAW AND DISCOVERY
21 GERALD ARMSTRONG; DOES 1 through)
25, inclusive,) HEARING JUDGE: DISCOVERY
22) REFEREE
23 Defendants.) TRIAL DATE: May 18, 1995
24)
25
26
27
28

1 PLEASE TAKE NOTICE that on March 9, 1995, at 10:00 a.m. or
2 as soon thereafter as may be heard at the offices of William
3 Benz, Esq., located at 900 Larkspur Landing Circle, No. 185,
4 Larkspur, California, plaintiff Church of Scientology
5 International ("Church") will appear by its attorneys Wilson,
6 Ryan and Campilongo and Moxon & Bartilson, and move this Court,
7 pursuant to California Code of Civil Procedure Section 2019(b)
8 for an Order striking 1,150 special interrogatories posed
9 defendant Gerald Armstrong ("Armstrong"), and awarding sanctions
10 to plaintiff of \$1,150. As grounds for its motion, plaintiff
11 states that the excessive interrogatories were interposed in
12 violation of C.C.P. 2030(); that the interrogatories are not
13 relevant to this litigation or calculated to lead to the
14 discovery of relevant evidence; that the interrogatories were
15 interposed for an improper purpose; and that defendant's counsel
16 refused to meet and confer with plaintiff's counsel.

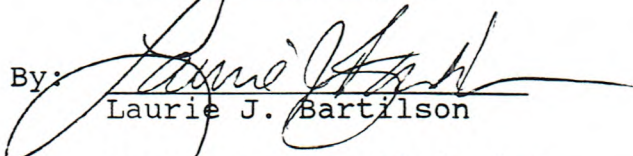
17 This Motion is based upon this Notice of Motion and Motion,
18 the accompanying Memorandum of Points and Authorities, the files
19 on record in this case, and such other and further evidence as
20 may properly come before this Court at the hearing of this
21 matter.

22 Dated: February 14, 1995

Respectfully submitted,

23 Andrew H. Wilson
24 WILSON, RYAN & CAMPILONGO

25 MOXON & BARTILSON

26 By: 
27 Laurie J. Bartilson

28 Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY INTERNATIONAL

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
 COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On February 14, 1995, I served the foregoing document described as PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR PROTECTIVE ORDER; REQUEST FOR SANCTIONS AGAINST DEFENDANT GERALD ARMSTRONG AND HIS ATTORNEY, FORD GREENE on interested parties in this action,

[] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [] the original [X] true copies thereof in sealed envelopes addressed as follows:

FORD GREENE
 HUB Law Offices
 711 Sir Francis Drake Blvd.
 San Anselmo, CA 94960-1949

Michael Walton
 700 Larkspur Landing Circle
 Suite 120
 Larkspur, CA 94939

William R. Benz, Esq.
 900 Larkspur Landing Circle, No. 185
 Larkspur, CA 94939

[x] BY MAIL

[] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[x] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of

business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on February 14, 1995 at Los Angeles, California.

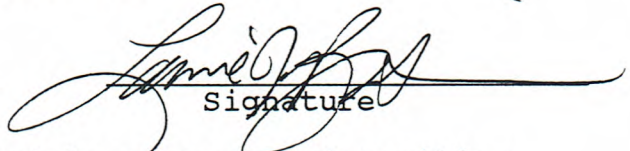
**** (BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

Executed on _____ at Los Angeles, California.

(State) I declare under penalty of the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Laurie J. Bartilson
Print or Type Name


Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)